

District Judge Ricardo S. Martinez

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHENGBO HE, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY, *et al.*,

Defendants.

CASE NO. 2:23-cv-261-RSM

JOINT STIPULATION AND  
ORDER TO CONTINUE DEADLINE

Noted for consideration on:  
June 15, 2023

Plaintiffs and Defendants, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 10(g) and 16, jointly stipulate and move to extend Defendants' time to respond to the Complaint until July 7, 2023. Twelve Plaintiffs bring this litigation pursuant to the Administrative Procedure Act and the Mandamus Act seeking, *inter alia*, to compel U.S. Citizenship and Immigration Services ("USCIS") to adjudicate their and their derivatives' Form I-485s, Applications to Register Permanent Residence or Adjust Status. Dkt. No. 1. Defendants' current response deadline is June 20, 2023. Good cause exists to extend Defendants' time to respond to the Complaint until July 7, 2023.

1 A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial  
 2 and trial dates is within the discretion of the trial judge. *See King v. State of California*,  
 3 784 F.2d 910, 912 (9th Cir. 1986).

4 The parties are diligently working to resolve this litigation. All Plaintiffs now have  
 5 approved Form I-485s. USCIS is producing the lawful permanent resident card (“LPR”) for the  
 6 last Plaintiff. To give the parties time to discuss potential resolution of this case, as well as allow  
 7 USCIS additional time to continue with its adjudications, the parties stipulate and jointly request  
 8 that the Court extend Defendants’ time to respond to the Complaint until July 7, 2023.

9 DATED this 15th day of June, 2023.

10 Respectfully submitted,

11  
 12 NICHOLAS W. BROWN  
 13 United States Attorney

14 s/ Michelle R. Lambert  
 15 MICHELLE R. LAMBERT, NYS #4666657  
 16 Assistant United States Attorney  
 17 United States Attorney’s Office  
 18 1201 Pacific Avenue, Suite 700  
 19 Tacoma, WA 98402  
 20 Phone: 253-428-3824  
 21 Fax: 253-428-3826  
 22 Email: [michelle.lambert@usdoj.gov](mailto:michelle.lambert@usdoj.gov)  
 23 Counsel for Defendants

24 /s/ Daniel P. Pierce  
 25 DANIEL P. PIERCE (pro hac vice)  
 26 Fragomen Del Rey Bernsen & Loewy, LLP  
 1101 15<sup>th</sup> Street NW, Ste 700  
 Washington, DC 200005  
 Phone: 202-223-5515  
 Email: [dpierce@fragomen.com](mailto:dpierce@fragomen.com)

/s/ Al Roundtree  
 AL ROUNDTREE, WSBA #54851  
 Fox Rothschild LLP  
 1001 Fourth Ave., Ste 4400

Seattle, WA 98154  
Phone: 206-624-3600  
E-mail: [aroundtree@foxrothschild.com](mailto:aroundtree@foxrothschild.com)  
*Attorneys for Plaintiffs*

**ORDER**

It is **SO ORDERED**.

DATED this 16<sup>th</sup> day of June, 2023.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE